

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

KATE DOYLE, et al.,)	
)	
Plaintiffs,)	Civ. Action No. 17-2542 (KPF)
)	
)	
v.)	
)	
)	
U.S. DEPARTMENT OF HOMELAND SECURITY,)	
EXECUTIVE OFFICE OF THE PRESIDENT,)	
)	
Defendants.		

DECLARATION OF SUPERVISORY INFORMATION TECHNOLOGY SPECIALIST
WILLIAM WILLSON, UNITED STATES SECRET SERVICE

I, William Willson, make the following declaration in lieu of affidavit pursuant to 28 U.S.C. §1746:

1. I am employed by the United States Secret Service (“Secret Service” or “Agency”) as the Branch Chief for Mission Applications within the Office of the Chief Information Officer of the United States Secret Service. I have a Bachelor of Science Degree in Information Systems Management and a Master’s Degree in Business Administration and Technology Management.
2. I joined the Secret Service in May of 2008 as an Information Technology Specialist and was immediately assigned to redesign a replacement for the Worker and Visitor Entrance

System (WAVES). In this capacity, I was tasked with designing, developing and deploying a new version of this system.

3. In my capacity as the Branch Chief for Mission Applications, I manage the WAVES system and am familiar with the information that is obtainable from the WAVES System.
4. It is my understanding that the time frame at issue in the above-captioned case is January 20, 2017, through March 8, 2017.

Post-Visit Status of WAVES/ACR Records

5. The Secret Service electronically transfers WAVES and ACR (Access Control Records) records to the WHORM (White House Office of Records Management) approximately every 30 days. I typically send an e-mail to the WHORM with the prior month's data around the beginning of the next month.
6. Records that are older than 60 days are ordinarily auto-deleted from the server operated by the Secret Service on a rolling basis. For example, on March 31, 2017, data from January 30, 2017 was auto-deleted from the server operated by the Secret Service.
7. An individual WAVES record contains the following fields:

NameLast	Last Name of Visitor
NameFirst	First Name of Visitor
NameMid	Middle Name of Visitor
DOB	Date of Birth of Visitor
SSN	Social Security Number of Visitor
UIN	Unique Identification Number
BDGNBR	Badge Number
Access_Type	Type of Appointment (i.e., visitor, worker)
TOA	Time of Arrival
POA	Place of Arrival (Turnstile)
TOD	Time of Departure
POD	Point of Departure
Appt_Made_Date	Date Appointment was made
Appt_Start_Date	Date Appointment starts
Appt_End_Date	Date Appointment ends

Appt_Cancel_Date	Date Appointment cancelled
Total_People	Number of people in the Appointment
Escort_Type	Type of Escort Required
Escort_Name_Last	Last Name of Escort
Escort_Name_F	First Name of Escort
Last_UpdatedBy	Person who last updated the record
Post	Area of turnstile location at arrival
LastEntryDate	Date of last change to the record
Terminal_Suffix	Identification of the computer at the post
Visitee_NameLast	Last Name of Visitee
Visitee_NameFirst	First Name of Visitee
Visitee_Phone	Phone Number of Visitee
Meeting_LOC	Meeting Location
Meeting_Room	Meeting Room Number
Caller_Name_Last	Last Name of the Person Making the Appointment
Caller_Name_First	First Name of the Person Making the Appointment
Caller_Phone	Phone Number of Person Making the Appointment
Caller_Room	Room Number of Person Making the Appointment
Note	Security Status Code
Description	Details regarding security or nature of event
AppointmentComments	Field used by the appointment requestor to pass information to Secret Service WAVES Center personnel about the appointment
HighlySensitiveMeeting	Notation by the requestor if it is a highly sensitive meeting
Caller_Email	Email address of the appointment requestor

PRA versus FOIA Components


8. It is my understanding that the United States Court of Appeals for the District of Columbia Circuit has determined that records that would disclose visitors to units in the Executive Office of the President whose sole function is to advise and assist the President (“PRA Components”) are Presidential records not subject to the FOIA. The Court also concluded that records that would disclose visitors to offices in the White House Complex that historically have been covered by the Freedom of Information Act are “agency records” subject to disclosure under the Act (“FOIA Components”).

9. From the information contained in the fields specified above, the Secret Service has no definitive method to ascertain whether the visitee is employed by a PRA Component or a FOIA Component. There is no field in the WAVES system that indicates what office the visitee is employed by, although the requestor's e-mail address in the Caller_Email field would reflect the component of the requestor. However, the visitee and the requestor may be different individuals from different components. As one example, only some individuals are authorized to make appointment requests, so a particular visitee may not have that authorization, and may request that an authorized passholder from another component submit the request.
10. In addition, there is no field to indicate the attendees at a meeting. So, a meeting can include attendees from FOIA components, PRA components, or some combination of the two. An employee of one of the FOIA components may request an appointment for a meeting that is attended by employees of PRA components as well.
11. The meeting location would also not provide definitive results as both the PRA Components and the FOIA Components utilize both the Eisenhower Executive Office Building (EEOB) and the New Executive Office Building (NEOB).
12. The description field is a "free form" field that allows users to make remarks regarding issues such as security arrangements regarding the visitor or the type of event the visitor is attending. These remarks, however, do not identify whether the event is sponsored by a PRA Component or a FOIA Component.
13. For all of 2017 and to the present, for the above-stated reasons, the Secret Service would have no definitive ability to discern from the WAVES records whether a visitor is making

a visit to an individual that was employed by a PRA Component or to an individual that was employed by a FOIA Component.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

10/23/17
Date


William Willson
Branch Chief, Mission Applications
United States Secret Service